

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA )  
                                )  
                                )  
v.                            )         CRIMINAL NO. 05-10184-GAO  
                                )  
                                )  
NOEL NEFF                  )

**GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS**

The United States of America, through its attorneys, Michael J. Sullivan, United States Attorney, and Robert E. Richardson, Assistant U.S. Attorney, hereby requests that the Court ask the following voir dire questions of the jury panel in addition to those questions the Court normally would ask:

1. As jurors, you will be the sole judges of the facts. When I instruct you as to the law, will you have any hesitation in following those instructions, even if you do not agree with the law as I have instructed you?
2. Have you, a family member, or a close friend or business associate ever been involved in a criminal case as either a victim, a witness, or a person charged with a crime? If so, please raise your hand and I will speak with you in private at the side bar.
3. Are you, a family member, or a close friend or business associate involved in the criminal justice system as a prosecutor, a defense attorney, an employee of either a prosecutor or a defense attorney, or as a law enforcement officer? If so, please raise your hand and I will speak with you in private at the side bar.
4. Have you, a family member, or a close friend or business associate had any experience with any police officer, police department, or other law enforcement officer or agency that may influence in any way your consideration of this firearms case?
5. This case is brought against the defendant by the United States of America. Have you, any member of your family, or a close friend ever had any dealings or experiences with the federal government, favorable or unfavorable, that might influence or affect your consideration of this case?

6. The defendant in this case is charged with federal offenses that make it unlawful to attempt to use an interstate facility, including the internet, to induce a minor to engage in sexual activity, and to travel in interstate commerce to engage in sexual conduct with a minor. Is there anything about the nature of the charges outlined here that would make it particularly difficult for you to be objective in evaluating the facts of this case or prevent you from rendering a fair and impartial verdict?
7. Do you have any beliefs, whether philosophical, religious, or otherwise that would prevent you from or make it difficult for you to pass judgment on another person?
8. Do you have any physical or other difficulties that might prevent you from seeing or reading exhibits introduced in evidence, from hearing the testimony that will come from the witness box, or otherwise interfere with your duties as a fair and impartial juror?
9. Certain of the witnesses that are expected to testify are law enforcement witnesses. Would you be either more likely or less likely to believe the testimony of a witness merely because that witness is a member of law enforcement?
10. Do you have any difficulty in understanding English that may affect your ability to understand the testimony of witnesses?
11. To admit to having some sympathy for either the defendant or the United States in this case is nothing to be ashamed of and does not reflect badly upon you as a person. However, both the United States and the defendant are entitled to have this case heard by a fair and impartial jury that will decide the case solely according to the evidence admitted in this Court, according to the Court's instructions on the law, and without regard to any bias, sympathy, prejudice or public opinion for either party. With this in mind, do any of you know any reason why you would be unable to give either the United States or the defendant a fair trial based solely on the evidence admitted at trial and the instructions given by the Court without regard to sympathy, bias or prejudice?

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/Robert E. Richardson  
ROBERT E. RICHARDSON  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I, Robert E. Richardson, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 12, 2006.

/s/Robert E. Richardson  
ROBERT E. RICHARDSON